

Before the
Federal Communications Commission
Washington, DC 20554

Accessibility of Communications)	
Technologies for)	
The First Biennial Report Under the)	CG Docket 10-213
Twenty-First Century)	
Communications And Video)	
Accessibility Act)	

PN – Comments – Accessibility of Communications Technologies

Comments of

Hearing Loss Association of America

These Comments are in response to the Public Notice released July 12, 2012 by the Commission seeking comment on the accessibility of communications technologies to inform the Commission’s preparation of the biennial report required by Twenty-First Century Communications and Video Accessibility Act (CVAA).

The Hearing Loss Association of America (HLAA) is the nation’s leading grassroots organization representing the rights of people with hearing loss. HLAA impacts accessibility, public policy, research, public awareness, and service delivery related to hearing loss on a national and local level.

Our comments are limited to issues related to hearing aid compatibility (HAC) corded landline and mobile phones.

III. Comment Sought on Industry Compliance with Section 255 and Section 716

7. (1) “non mobile” services: analog and digital phone telephone handsets and cordless phones used with landline and interconnected VoIP services

- To what extent do the input and output controls of these telecommunications and interconnected VoIP services and devices used with these services offer redundant capabilities, so that people without hearing, vision, or speech, or with limited manual dexterity, cognitive skills, or other abilities can operate them.

Mainstream analog and digital phones, those that are not specifically built to meet the needs of people with hearing loss, often do not incorporate ports that accept neckloops. That is particularly true for those phones that consumers can purchase at lower price points. Some mainstream phones have been designed for use with a speaker phone or blue tooth features that do not always provide adequate quality of sound, making it difficult for people with a significant hearing loss to understand what is being said on those phones. In fact, quality of sound is very important to people with hearing loss, but appears to be less important to mainstream landline phone manufacturers.

- To the extent that accessible services and devices are available, how easy is it to locate these services and devices in mainstream retail establishments?

“Specialty Phones” are wireline phones that are capable of increasing the gain on the volume to levels to 25 dB, 30 dB or 40 dB, and thus more accessible to someone with a significant hearing loss. These phones are typically are not found in mainstream retail stores. They are available on line from mail order companies that specialize in products for people with hearing loss. We are also beginning to see some mainstream retail companies, like Best Buys and mainstream mail order houses such as Amazon, make these specialty phones available over the Internet. However, the fact that these are not readily available in mainstream retail stores is problematic for people who need to test phones before they buy them.

- To what extent are services and devices offered with a range of low-end and high-end features, functions, and prices available to the general public also accessible to individuals with disabilities?

Specialty phones are available in a range of price points. However, the low end specialty phone is more expensive than low end mainstream phones. For example, one website, Sonic Alert, lists 10 specialty corded phones ranging from \$49.00 to \$199.00

<http://www.sonicalert.com/amplified-phones-corded-phones.html>. Harris Communication lists 55 corded specialty phones ranging from \$29.95 to \$249.95. Teltex lists 15 phones from \$29.95 to \$169.95. <http://www.teltex.com/Amplified-Corded-Telephones-C10.aspx?ShowAll=true>

Radio Shack lists over 50 non-specialty corded phones ranging from \$7.99 to \$179.99 with a number of price points in between, carrying a range of features for consumers to select.

<http://www.radioshack.com/family/index.jsp?s=A-StorePrice-RSK&retainProdsInSession=1&searchSort=TRUE&categoryId=2032065&pg=1&searchSort=TRUE&retainProdsInSession=1> Best Buys lists 150 phones ranging in price from \$7.99 to \$396.00.

7. (2) “mobile” or wireless services, including basic phones and smart phones

- The extent that accessible services and devices are available, how easy is it to locate these services and devices in mainstream retail establishments?

HAC mobile phones are not easily to locate in mainstream retail establishments, even the stores of service providers. Consumers report to HLAA that they depend on the knowledge of the store sales staff for information about available HAC phones. When store staff are well trained, are knowledgeable about their HAC phones, the consumer is well served; where they are not, the consumer may or may not be able to find what they need in the store.

- To what extent are services and devices offered with a range of low-end and high-end features, functions, and prices available to the general public also accessible to individuals with disabilities?

It appears that HAC mobile phones are offered in a range of features and at different price points.

- Where services and devices are not accessible, to what extent are service providers and manufacturers making these compatible with peripheral devices and specialized customer premises equipment commonly used by people with disabilities to achieve access?

Many mobile devices have a port that allows for a neckloop or headset that could make the mobile phone accessible. However, some phones do not have port for a standard size jack. Even when the port is standard, someone who is using a neckloop or headset or other device must connect the device before they can use the phone. For outgoing calls that can provide the needed access, but it not always easy or even possible to connect that device to the phone in time to answer incoming calls. Many consumers have let HLAA know they prefer to have a handset that works out of the box rather than search for a peripheral device that will work well with their hearing aid or cochlear implant.

8.

- To what extent are companies providing training on the accessibility of their products and services to customer service representatives, technical support personnel and others having direct contact with the public?

Training of customer service personnel regarding HAC mobile phones appears to be problematic. Consumers report that personnel often do not know what a HAC phone is or how to find which phones are HAC among those the service provider sells.

- Are manufacturers and service providers including people with disabilities in their market research, product design, testing, pilot demonstrations, and product trials?

We are unaware of mainstream mobile phone manufacturers or service providers who include people with hearing loss in their market research, product design, testing, pilot demonstrations or product trials.

- To what extent are covered entities working cooperatively with disability-related organizations in their efforts to incorporate accessibility, usability, and compatibility of equipment and services throughout their processes for product design, development, and fabrication?

HLAA is aware that some mobile phone manufacturers are working with hearing aid companies and with research institutions on issues related to accessibility, usability and compatibility. However, we are not privy to the details of those endeavors, and it's our understanding that those practices are limited.

In terms of manufacturers working cooperatively with HLAA on accessibility usability and compatibility issues for people with hearing loss, since the ATIS incubator group disbanded, there has been little in the way of outreach to us to get input on the features that would make mobile phones accessible and usable for people with hearing loss.

- Are covered entities making reasonable efforts to validate unproven access solutions through testing with people with disabilities or with organizations that have expertise with people with disabilities?

HLAA is unaware of any validation of unproven access solutions through testing with people with hearing loss by covered entities. None have reached out to HLAA for such testing.

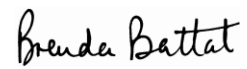
- Finally, we seek comment on any other issues relevant to assessing the level of compliance with Section 255 and the Commission's implementing rules, as these pertain to the accessibility and usability of telecommunications and interconnected VoIP services and equipment.

HLAA has seen a steady improvement in the accessibility of both landline and mobile phones for people hearing loss, and that is a credit to both the manufacturers and service providers who make HAC phones available. However, there is still a long way to go before people with hearing loss will be able to find the phones they are looking for with ease: those that have the features out of the box that meet their communication needs.

We urge the Commission encourage mobile phone manufacturers to work closely with consumers and with hearing aid manufacturers to ensure that newly designed phones are compatible with hearing aids. We would like to see consumers and consumer organizations part of the testing and trials to ensure accessibility, usability and compatibility of landline and mobile phones. We encourage the Commission to hold a summit(s) that would include hearing aid manufacturers, cell phone manufacturers, consumers and the US Food and Drug Administration (FDA), which has oversight on hearing aids, to resolve any issues related HAC mobile phones, including the M and T ratings on the hearing aids. All of that will have a positive impact on a consumer's ability to find and use more mobile phones that are will be compatible with their hearing aids and/or cochlear implants.

Thank you for this opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink that reads "Brenda Battat". The script is cursive and fluid.

Brenda Battat
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